

State of Illinois



ILLINOIS COMMERCE COMMISSION

October 9, 2003

The Honorable Magalie Roman Salas
Secretary
Federal Energy Regulatory Commission
Room 1-A
888 First Street, N.E.
Washington, DC 20426

Re: Inquiry Into Midwest ISO-PJM RTO Issues, Docket No. ER03-262-001, *et al.*

Dear Secretary Salas:

The Illinois Commerce Commission (ICC) is pleased that the Federal Energy Regulatory Commission (FERC) convened a hearing on September 29 and 30 to explore ways to resolve persistent and outstanding issues surrounding several Midwest utilities' commitments to join either the Midwest Independent Transmission System Operator, Inc. (MISO) or PJM Interconnection L.L.C. (PJM). It is the ICC's hope that these hearings and the feedback you have received will keep the region moving toward the goal of enhancing regional coordination and establishing a joint and common market between MISO and PJM.

The ICC is committed to developing competitive retail electric markets for the benefit of Illinois consumers. Without a regional, competitive wholesale power market in the Midwest, it will be very difficult to successfully bring the benefits of retail competition to Illinois electricity consumers. The ICC, therefore, strongly supports FERC's efforts to develop regional, competitive wholesale power markets and a joint and common market between MISO and PJM.

In Illinois, only one electric public utility, AmerenCILCO, has fully integrated into a Regional Transmission Organization (RTO). The ICC is eager to see the rest of the Illinois utilities fulfill their commitments to join a RTO so that the benefits of efficient, regionally managed wholesale power markets may be brought to all Illinois electricity consumers.

There have been notable developments regarding the efforts of the other large utilities in Illinois to join RTOs. First, Ameren (CIPS and UE) has committed to join MISO through GridAmerica. However, full integration of Ameren into MISO is delayed pending approval of the Missouri Public Service Commission. Second, Commonwealth Edison (ComEd) has committed to joining PJM, but the integration date has been put on hold pending the investigation of the August 14 blackout. Finally, Illinois Power Company (IP) has no firm commitment to join either MISO or PJM. However, it may be assumed that, if Exelon

Corporation's announced plan to acquire IP is consummated, IP would likely join ComEd in PJM. The ICC urges the FERC to ensure that each of these utilities work in earnest to resolve outstanding issues so that they can move forward with integration into a RTO.

The ICC's interest in these issues is not limited to the RTO commitments of Illinois utilities. Regardless of whether Illinois utilities land in PJM or MISO, regional coordination must be enhanced to make the Midwest wholesale market a reality. This includes the need for a clear and detailed joint operating agreement between PJM and MISO, as well as strong congestion management and seams agreements. Additionally, while the development of a joint and common market is the desired end goal, there must be a set of standards in place to deal with any market-to-non-market issues prior to full RTO market operations in the Midwest.

When we speak of a fully developed Midwest market, we must address a major piece missing from the regional puzzle: American Electric Power (AEP). The ICC shares the FERC's concerns about the stalemate that appears to have developed with respect to AEP joining PJM. Certainly, proper development of a Midwest market will be stalled as long as AEP remains outside a RTO. For this reason, we join our colleagues from the Indiana, Michigan and Pennsylvania commissions who testified at the recent hearing in urging FERC to require AEP to fulfill its merger condition and join a RTO promptly.

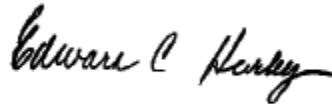
The ICC is not satisfied by AEP's recent proposal to transfer functional control of portions of its transmission system to PJM without participation in the PJM market place. While the transfer of functional control of transmission facilities is a step in the right direction, it does nothing to resolve the problems associated with operating ComEd as an island in the PJM market. AEP's proposal does not bring the Midwest any closer to completing the puzzle of a coordinated Midwest wholesale power market.

Resolving the AEP issue and having AEP in the Midwest market place will further the public interest. Moreover, while this controversy festers, we have some concerns that other utilities and states may begin retreating from the new competitive paradigm. Illinois has made great progress in developing competitive retail markets. The progress we have experienced could be threatened by continued uncertainty surrounding AEP's participation in a RTO. Therefore, we urge FERC to take action to resolve this uncertainty immediately.

Again, the Illinois Commerce Commission appreciates the opportunity to participate in this important dialogue regarding the development of RTO-managed wholesale markets in the

Midwest. We offer our assistance in any way that may help to continue the forward motion. Thank you for your consideration.

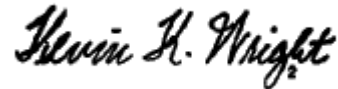
Sincerely,



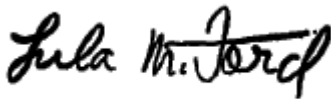
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cc: The Honorable Pat Wood, III, Chairman
The Honorable Nora Mead Brownell, Commissioner
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